

1 ROBERT W. FREEMAN  
Nevada Bar No. 3062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
PAMELA L. McGAHA  
3 Nevada Bar No. 8181  
[Pamela.McGaha@lewisbrisbois.com](mailto:Pamela.McGaha@lewisbrisbois.com)  
4 E. MATTHEW FREEMAN  
Nevada Bar No 14198  
5 [Matt.Freeman@lewisbrisbois.com](mailto:Matt.Freeman@lewisbrisbois.com)  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
6 6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
7 702.893.3383  
FAX: 702.893.3789  
8 Attorneys for Defendant  
State Farm Mutual Automobile Insurance Company

9  
10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA, SOUTHERN DIVISION

12 \*\*\*

13 JOSHUA MOLINA,  
14 Plaintiff,

15 vs.

16 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; and DOES I  
17 through X, inclusive and ROE ENTITIES I-X,  
inclusive,

18 Defendants.

CASE NO.: 2:21-cv-0051-KJD-VCF

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE TO FILE  
DISPOSITIVE MOTIONS**

**FIRST REQUEST**

19  
20 Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of  
21 record, hereby stipulate and request that this Court extend the deadline to file dispositive motions  
22 in the above-captioned case sixty (60) days, up to and including Tuesday, February 15, 2022.

23 This Request for an extension of time is not sought for any improper purpose or other  
24 purpose of delay. This request for extension is based upon the following:

25 Counsel for Defendant is currently preparing for trial in *Latham v. City of Henderson*,  
26 Eighth Judicial District Court Case No. A-19-790017-C and also in *Barrese v. Las Vegas*  
27 *Metropolitan Police Department, et al*, United States District Court Case No. 2:18-cv-1671-KJD-  
28 EJY.

1 WHEREFORE, the parties respectfully request that this Court extend the time for the  
2 parties to file their dispositive motions by sixty (60) days from the current deadline of December  
3 17, 2021 up to and including February 15, 2022.

4 Dated this 22<sup>nd</sup> day of November, 2021.

Dated this 22<sup>nd</sup> day of November, 2021.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

KAPLAN COTTNER

6 */s/ Pamela L. McGaha*

*/s/ Kory L. Kaplan*

7 ROBERT W. FREEMAN

KYLE P. COTTNER

8 Nevada Bar No. 3062

Nevada Bar No. 12722

PAMELA L. McGAHA

KORY L. KAPLAN

9 Nevada Bar No. 8181

Nevada Bar No. 13164

E. MATTHEW FREEMAN

850 E. Bonneville Ave.

10 Nevada Bar No. 14198

Las Vegas, Nevada 89101

6385 S. Rainbow Boulevard, Suite 600

*Attorneys for Plaintiff*

11 Las Vegas, Nevada 89118

Attorneys for Defendant

12 State Farm Mutual Automobile Insurance

Company

13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 22<sup>nd</sup> day of November, 2021.

16 

17 UNITED STATES MAGISTRATE JUDGE